

RESPONDENT INFORMATION FORM

United Nations Convention on the Rights of Persons
with Disabilities (UNCRPD)

Consultation on the Scottish Government's Draft
Delivery Plan 2016-2020



Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

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3. Permissions - I am responding as...

Individual / Group/Organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick **ONE** of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate

Yes No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

ADDITIONAL INFORMATION

Together (Scottish Alliance for Children's Rights) is an alliance of children's charities that works to improve the awareness, understanding and implementation of the United Nations Convention on the Rights of the Child (UNCRC) in Scotland. With 300 members, our key aims include progressing children's rights at a local and national level through the provision of support and expertise, and providing robust monitoring of UNCRC implementation in Scotland at a national and international level.

The views expressed in this submission are based on the UNCRC and its General Comments, and do not necessarily reflect the specific views of each Together member organisation.

CONSULTATION QUESTIONS

Outcomes

Section 2 of the delivery plan sets out four outcomes the Scottish Government and its partners are working towards. The outcomes are:

1. Equal and inclusive access to the physical and cultural environment, transport and suitable, affordable housing.
2. Equal and inclusive access to healthcare provision and support for independent living, with control over the best use of resources, including support for disabled children.
3. Equal and inclusive access to education, paid employment and an appropriate income and support whether in or out of work.
4. Equal and inclusive access to the justice system without fear of being unfairly judged or punished, and with protection of personal and private rights.

Q1: Do you agree or disagree that together these four outcomes cover the key areas of life the Scottish Government and its partners must focus on to achieve the rights of disabled people?

Agree

Disagree

Neither agree nor disagree

Q2: Please comment here on your response above, or if you have any other comments on the outcomes

Together is concerned that disabled children are only explicitly referred to in outcome 2. As the remaining three outcomes are equally relevant to the rights of children as to adults, a reference to children in only one of the four outcomes is problematic. This could lead to a narrow focus on how the Delivery Plan will support disabled children's healthcare provision, rather than supporting children's rights in relation to all areas of life covered in the remaining three outcomes.

Disabled children continue to experience serious difficulties and face multiple barriers to the full enjoyment of the rights enshrined in the UNCRC¹: A Delivery Plan to implement the UNCRPD should therefore take action to address these barriers which should be clearly reflected in all four outcomes.

Each outcome should seek to fulfil Article 7 UNCRPD which requires the government to ensure that disabled children enjoy all of their human rights on an equal basis with other children; that in all actions concerning disabled children, their best interests shall be a primary consideration and that disabled children have the right to express their views freely on all matters affecting them, on an equal basis with other children, and that their views are taken into full account.²

¹ See http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 25)

² See <http://www.ohchr.org/EN/HRBodies/CRPD/Pages/ConventionRightsPersonsWithDisabilities.aspx> (Article 7)

Commitments

The following section invites your comments on the commitments the Scottish Government is making to help achieve the four outcomes.

There are a lot to consider and there is no requirement for you to provide an opinion on all of them if you don't wish to.

Outcome 1 - Equal and inclusive access to the physical and cultural environment, transport and suitable, affordable housing

Q3: Do you agree or disagree that the commitments (1-16) described at Section 2.1 will help the Scottish Government make progress towards outcome 1?

Agree

Disagree

Neither agree nor disagree

Q4: If you would like to make specific comments on any of the commitments intended to contribute to achieving outcome 1, please do so here. If not please skip to next question.

(Please refer to Section 2.1 for fuller descriptions of the commitments)

Commitment (Outcome 1)	Comment
1. Transport accessibility	<p>As highlighted in Together's 2015 report to the UN Committee on the Rights of the Child,³ disabled young people have called for steps to be taken to provide accessible transport so that they can travel alone, increasing their independence and opportunity to build friendships.</p> <p>Disabled young people have noted the importance that professionals in public-facing roles (including transport) are given training to ensure that they are</p>

³ http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf

	more sensitive to the needs of, for example, autistic children. ⁴
2. Design for Ageing	
3. Raising awareness of accessible design	
4. Homes which are more accessible	
5. Accessible housing	
6. A new help guide aimed at boosting accessible design	
7. A new help guide to assist tourism businesses	
8. A new help guide setting out key accessibility hints and tips	
9. Access statement online tool builder	
10. Widening access and increasing opportunities for disabled people to engage in culture, heritage and the arts	The Delivery Plan should link to the National Youth Work Strategy 2014-2019, to ensure that action is taken so that disabled young people have equal access to youth work.
11. Recording and reporting of workforce diversity information	
12. Improving access to the historic environment and collections relating to the historic environment	
13. Disability Inclusion in Sport	The Delivery Plan should link to Scotland's sport strategy for children and young people ' <i>Giving children and young people a sporting chance</i> ', of which a stated outcome is: <ul style="list-style-type: none"> • Facilities are welcoming for children and young people, and meet the needs of a wide range of different users including those with disabilities and hard-to-reach groups.⁵
14. Action plan to promote disabled people's participation in sport and physical activity	See above.
15. Sportscotland investments	
16. One Scotland awareness raising campaign	

⁴ http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 26)

⁵ <http://www.gov.scot/Resource/0045/00453122.pdf>

Q5: Are there any additional commitments and/or ways that you would strengthen the outcome 1 commitments that you have not already mentioned in any comments above?

In order to strengthen the outcome 1 commitments for disabled children and young people, a Child Rights and Wellbeing Impact Assessment (CRWIA) should be used to predict, monitor, strengthen or if necessary, avoid, the impact of each commitment on disabled children and young people. This would help to identify where further commitments are necessary, or existing commitments should be amended, in order to fulfil the government's obligations under the UNCRPD for disabled children and young people.

Article 9 of the UNCRPD on accessibility to the physical environment, to transport, to information and communications and to other facilities both in urban and rural areas should be implemented in line with the government's obligations under the UNCRC. In developing outcomes as part of a UNCRPD Delivery Plan, it is crucial to consider in partnership the rights of all children as enshrined in the UNCRC. For example, Article 31 requires the Scottish Government to recognise the right of every child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.⁶ Article 31 notes that there should be provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity, which is further outlined in General Comment No. 9 to the UNCRC.⁷ Furthermore, Article 24 requires the Scottish Government to provide a standard of living adequate for every child's physical, mental, spiritual, moral and social development (this includes the provision of assistance with regard to housing).⁸

The UN treaties should not be viewed in silos but rather in a way which reflects that the UNCRPD recognises the specific vulnerabilities of and difficulties facing disabled children and young people, and offers added protections in addition to their rights as enshrined in the UNCRC.

Outcome 2 - Equal and inclusive access to healthcare provision and support for independent living, with control over the best use of resources and support for disabled children

Q6: Do you agree or disagree that the commitments (17-35) described at Section 2.2 will help the Scottish Government make progress towards outcome 2?

⁶ See <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx> (Article 31)

⁷ See

https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKEwio54ST_63JAhXMvRoKHSZqCqwQFqghMAA&url=http%3A%2F%2Fwww2.ohchr.org%2FenGLISH%2Fbodies%2Fcr%2Fdocs%2FGC9_en.doc&usq=AFQjCNEO4NxmyVM4KdfuoZyKaeZEA3ZUSQ

⁸ See <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx> (Article 27)

Agree

Disagree

Neither agree nor disagree

Q7: If you would like to make specific comments on any of the commitments intended to contribute to achieving outcome 2, please do so here. If not please skip to next question.

(Please refer to Section 2.2 for fuller descriptions of the commitments)

Commitment (Outcome 2)	Comment
17. Health Inequalities of people with learning disabilities data collection	
18. Advocacy	Actions related to advocacy must pay specific attention to particularly vulnerable disabled children, including looked after and LGBT disabled children and young people ⁹ , as well as children with mental health needs and those with additional support needs and communication needs. ¹⁰
19. The New framework for Hearing the Citizen Voice	
20. Routes to Inclusion – ‘Engaging disabled people and their organisations’	
21. Allied Health Professionals and Independent Living – delivery plan	
22. NHS - 2 year internship for disabled graduates in partnership with NHS Scotland and Glasgow Centre for Inclusive Living Equality Academy	
23. NHS Scotland Learning Disability Employment Programme	
24. Disability Inclusion Promotional Campaign	
25. Measure compliance of NHS Boards on embracing equality diversity and human rights in the NHS in Scotland	
26. Child Rights and Wellbeing Impact Assessment (CRWIA) for all policy development affecting children	
27. Fund for projects to support disabled children and their families	
28. Information Hub	
29. Transitions Test of Change Project	
30. Child Internet Safety stakeholder group	

⁹ http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (Page 19)

¹⁰ Refer to submission by Inclusion Scotland (page 26 and 27)

31. Review of inclusion of people with learning disabilities or autistic spectrum disorders under the Mental Health (Care and Treatment) (Scotland) Act 2003.	
32. Consult on Scottish Law Commission's review of the Adults with Incapacity Act and thereafter carry out a scoping exercise in relation to a wider review of the Adults with Incapacity legislation.	
33. Review of policies on guardianship and consider circumstances in which supported decision making can be promoted	
34. An integrated children's rights and equalities impact assessment for the Scottish Children's Reporter Administration	
35. Enhanced learning and development framework for foster carers	

Q8: Are there any additional commitments and/or ways that you would improve the outcome 2 commitments that you have not already mentioned in your answers above?

Together welcomes commitment 26 to conduct a CRWIA for all policy development affecting children. Together recommends that this commitment is included as part of each outcome and that this commitment is not restricted to policy development, but to all projects and programmes that will take place in implementing the Delivery Plan.

Outcome 2 focuses on healthcare provision yet does not refer to Child and Adolescent Mental Health Services (CAMHS). It is concerning that at present, the draft Delivery Plan makes little reference to mental health services. Article 1 UNCRPD stipulates that *'persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.'*¹¹

Article 23 of the UNCRC recognises that disability can be mental or physical and that every child should enjoy a full and decent life which ensures dignity, promotes self-reliance and facilitates the child's active participation in the community. Children and young people with mental health needs continue to experience a disproportionately high number of human rights violations, yet the services necessary to protect and promote their rights remain inadequate.¹² Additional

¹¹ See: <http://www.ohchr.org/EN/HRBodies/CRPD/Pages/ConventionRightsPersonsWithDisabilities.aspx> (Article 1)

¹² See: http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 27)

commitments for outcome 2 should include the provision of CAMHS to meet the needs of all disabled children requiring support, in a timely and effective manner.

Disabled children and young people who are looked after continue to face additional barriers to the enjoyment of their rights. They remain a hidden group and report experiences of not being listened to. Furthermore, disabled looked after children and young people often experience a higher turnover of placements. There is a lack of reliable local authority data collection on the number of looked after children with specific additional support needs and the subsequent support that is provided.¹³ Together recommends that a commitment should be included under outcome 2 to address the disproportionate number of disabled children and young people who are looked after, and to ensure that there is nationally collected data on the numbers of disabled children in care.

¹³ See: http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 19)

Outcome 3 - Equal and inclusive access to education, employment and an appropriate income whether in or out of work

Q9: Do you agree or disagree that the commitments (36-48) described at Section 2.3 will help the Scottish Government make progress towards outcome 3?

Agree

Disagree

Neither agree nor disagree

Q10: If you would like to make specific comments on any of the commitments intended to contribute to achieving outcome 3, please do so here. If not please skip to next question.

(Please refer to Section 2.3 for fuller descriptions of the commitments)

Commitment (Outcome 3)	Comment
36. Continued commitment to implement additional support for learning	This is important but should also take into account the concerns raised by Together, the Children’s Commissioner, the Equality and Human Rights Commission, the Scottish Human Rights Commission and others, that the Education (Scotland) Bill puts in place a number of barriers that may prevent children and young people from exercising additional rights.
37. Anti-Bullying –respectme and review and refresh of the ‘National Approach to Anti-bullying for Scotland’s Children and Young’	This commitment should link to steps being taken to tackle and encourage the reporting of hate crime.
38. Overarching commitment from Fair Work Directorate	
39. Investment in Developing the Young Workforce and further investment to support young people with barriers to employment including disability	This commitment should refer to the accessibility of information, support and guidance regarding seeking employment, as disabled young people transition from school to employment, and more widely from child to adult services. ¹⁴
40. Supported Employment Model	
41. Supported Businesses	
42. Establishment of a Fair Work Convention	

¹⁴ See: http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 27)

43. Disability Employment Services in Scotland	
44. Ensuring flexible and integrated support is put in place to support individuals with particular needs, including disabled people into work	
45. Abolish fees for employment tribunals and consultation re barriers that disabled people face when raising a claim at an Employment Tribunal	
46. Disability Benefits Advocacy Support	
47. Future reform of local taxation will take into account the particular needs expressed by disabled people	
48. Establishment of a social security system that treats people with dignity and respect during their time applying for, being assessed and receiving disability benefits.	Disabled children and young people and children living with a disabled family member are disproportionately affected by Welfare Reform: ¹⁵ A commitment should be included to focus on the specific steps being taken to mitigate the effects on both groups.

Q11: Are there any additional commitments and/or ways that you would strengthen the outcome 3 commitments that you have not already mentioned in your answers above?

In order to strengthen the outcome 3 commitments for disabled children and young people, a Child Rights and Wellbeing Impact Assessment (CRWIA) should be used to predict, monitor, strengthen or if necessary, avoid, the impact of each commitment on disabled children and young people. This would help to identify where further commitments are necessary, or existing commitments should be amended, in order to fulfil the government's obligations under the UNCRPD for disabled children and young people.

Outcome 4 - Equal and inclusive access to the justice system without fear of being unfairly judged or punished, and with protection of personal and private rights

Q12: Do you agree or disagree that the commitments (49-54) described at Section 2.4 will help the Scottish Government make progress towards outcome 4?

¹⁵ See: http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 30)

Agree

Disagree

Neither agree nor disagree

Q13: If you would like to make specific comments on any of the commitments intended to contribute to achieving outcome 4, please do so here. If not please skip to next question.

(Please refer to Section 2.4 for fuller descriptions of the commitments)

Commitment (Outcome 4)	Comment
49. Review of legal aid contributions for disabled people	This commitment should take into account the concerns raised by Together in its NGO report to the UN regarding the increasing limits placed on children’s access to legal aid. ¹⁶
50. Encourage reporting of hate crimes against disabled people	<p>A holistic approach needs to be taken to encourage the reporting of hate crime against disabled children and young people. Many disabled children and young people do not recognise when a hate crime is being committed. Some do not have confidence that any action will be taken if they do report a hate crime. More links need to be made between bullying behaviour in schools and hate crime, whilst also recognising that not all disabled children and young people will be in mainstream education.</p> <p>Approaches to tackle hate crime and encouraging reporting need to raise awareness of the impact and consequence of hate crime among the wider public, raising awareness of what constitutes a hate crime among disabled children and young people and increase their confidence that action will be taken if they report a hate crime.</p>
51. Accessible information	
52. Accessibility of sites and services	
53. Develop and deliver a ‘pilot’ improvement project focusing on preventing and removing disability hate crime from society	
54. Engage with DPOs to explore extent of violence against disabled women and girls, in the context of our ambitions under Equally Safe	

¹⁶ See: http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 3)

Q14: Are there any additional commitments and/or ways that you would improve the outcome 4 commitments that you have not already mentioned in your answers above?

In order to strengthen the outcome 4 commitments for disabled children and young people, a Child Rights and Wellbeing Impact Assessment (CRWIA) should be used to predict, monitor, strengthen or if necessary, avoid, the impact of each commitment on disabled children and young people. This would help to identify where further commitments are necessary, or existing commitments should be amended, in order to fulfil the government's obligations under the UNCRPD for disabled children and young people.

Disabled children and young people face additional challenges to accessing justice, such as a lack of accessible information on how to seek justice and particularly for children with communication needs. Facing complex laws and legal systems designed for adults as well as the substantial barrier in accessing legal assistance reflects the need for outcome 4 to focus on the rights of disabled children and young people, who face additional barriers to adults in seeking redress when their rights have been violated.¹⁷

Themes

Section 3 of the delivery plan outlines three 'cross-cutting' themes – which are ways of working – and which will underpin all that we do to deliver each of the outcomes. The themes are:-

- Disabled people are empowered to participate fully
- Communication is accessible and inclusive of all
- The barriers facing disabled people are known, understood and addressed

Q15: Do you agree or disagree that these are the most important themes that the Scottish Government needs to build in to the way it works across all activity to achieve the rights of disabled people?

Agree

Disagree

Neither agree nor disagree

Q16: Please comment here on your response above, or if you have any further comments on the themes

¹⁷ See: http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 3/4)

The three cross-cutting themes outlined in the draft Delivery Plan are incomplete and should be further developed to ensure that a comprehensive child rights-based approach is reflected in the themes, which will underpin delivery of the proposed outcomes.

The term 'rights-based' is used broadly to describe work influenced by international human rights standards, including those enshrined in the UNCRPD and UNCRC. Of fundamental importance in applying a rights-based approach in practice are the PANEL principles: Participation, Accountability, Non-discrimination, Empowerment and Legality.¹⁸ Each principle should provide a framework through which all decisions and actions are taken, to ensure that every disabled child, young person and adult is able know and understand their rights and participate in shaping the decisions that impact on them. Whilst the above cross-cutting themes reflect these principles, they omit any reference to accountability or legality. Together recommends that in order for the cross-cutting themes to support a full child rights-based approach, two additional themes are necessary:

- Those with the responsibility to fulfil the Delivery Plan are held to account and for this to be effective, there must be appropriate laws, policies, institutions, administrative procedures and mechanisms of redress, in order to secure the rights as enshrined in the UNCRC and UNCRPD.
- The rights of disabled children and adults are recognised as legally enforceable entitlements, in relation to national and international human rights law.

A focus on the rights of disabled children and young people is necessary in order to recognise their particular vulnerabilities and the multiple additional barriers that they face in accessing and enjoying their rights (as enshrined in the UNCRPD, the UNCRC and elsewhere in international and national law). In defining the cross-cutting themes, the Delivery Plan should refer specifically to the rights of disabled children and young people, and the steps needed to ensure a child rights-based approach is taken forward as outlined in the PANEL principles.

Next steps and any further comments

Q17: Section 5 of the delivery plan details the next steps for the Scottish Government's approach to making the UNCRPD a reality for disabled people in Scotland. Do you have any comments on this section, or anything additional you would like to see added here?

¹⁸ See: <http://www.scottishhumanrights.com/careaboutrights/section1-page03>

[Empty box]

Q18: Are there any other comments you would like to make on the overall delivery plan, to inform its further development and implementation?

The Scottish Government has developed a Child Rights and Wellbeing Impact Assessment (CRWIA) tool which should be used to fully identify, analyse, strengthen or mitigate the impacts that the UNCRPD Draft Delivery Plan 2016-2020 may have on the rights and wellbeing of all children and young people. This would ensure that the impact of the proposals are predicted, monitored, and if necessary, avoided and provide a basis for ongoing evaluation of the Delivery Plan. Undertaking a CRWIA would be in line with the Scottish Government's commitment to children's rights: It is an approach that can assist the government to fulfil its existing obligations under the UNCRC and the ministerial duties outlined in Part 1 of the Children and Young People (Scotland) Act 2014.

The Scottish Government should take into full account the findings from Inclusion Scotland's consultation events with disabled children and young people. This will help to ensure that the development of the Delivery Plan is informed by the views of children and young people themselves. As set out in Article 12 of the UNCRC, the Scottish Government is obliged to ensure that every child has the opportunity to be meaningfully involved in decisions affecting them. Seeking and taking forward children and young people's views would help to fulfil the Scottish Government Ministerial duty to consider children's views, as set out in Part 1 of the Children and Young People (Scotland) Act 2014.

In further development and implementation of the Delivery Plan, it is important to assess the cross-cutting nature of the UNCRPD with other UN Treaties and in relation to other Scottish Government national action plans, policies and legislation. With regards to the rights of disabled children and young people, it is important that this recognition is explicit in the Delivery Plan and that efforts are made to ensure coherence across government departments in respecting, protecting and fulfilling the rights of disabled children and young people. The UNCRPD Action Plan should not be developed and implemented in a silo but in partnership with the current and forthcoming Action Plans to implement obligations within other UN Treaties such as the UNCRC.¹⁹

Together would like to draw attention to Section 1.3 which seeks to define the 'social model' of disability. It includes that:

"If we are to achieve our aim of full equality and human rights for disabled people in Scotland, then we must take account of all disabled people, including disabled children and young people and older people, whether they are disabled by impairment or long-term condition from birth or acquire it during the course of their life."²⁰

This seems contradictory to a social model of disability, which does not define a disability by impairment or long-term condition but through the barriers created by society as the cause of

¹⁹ See: <http://www.gov.scot/Publications/2009/08/27111754/25> and <http://www.gov.scot/Resource/0039/00392997.pdf>

²⁰ <http://www.gov.scot/Resource/0048/00484854.pdf> (page 13)

disadvantage and exclusion rather than the impairment itself. Together recommends that the above sentence might be rewritten to state '*...whether they have an impairment or long-term condition from birth or acquire it during the course of their life.*'²¹ to ensure clarity in defining the social model of disability.

Page 14 of the Delivery Plan proposes to reduce and remove the barriers facing disabled people of all ages to ensure full and equal access to a number of services, the built environment, information, employment, and more. Yet the list does not include the opportunity to socialise and establish and maintain friendships. As highlighted in Together's UNCRC NGO report to the UN earlier this year, disabled children repeatedly call for steps to be taken to allow them to increase their independence and build friendships.²² Together recommends that the list included on page 14 should be amended to include the barriers facing children and young people in socialising and making friends.

Together recommends that included within the Delivery Plan is a commitment to provide an update of progress made/gaps in progress (see Do The Right Thing: Progress Report²³ for instance). Such a Delivery Plan progress report should review the extent to which outcomes have been met against specific SMART actions (specific, measureable, achievable, relevant, time bound).

In addition, Together would strongly welcome detail within the Delivery Plan as to what steps will be taken to integrate both the UNCRC 2016 Concluding Observations (expected May/June) and UNCRPD Concluding Observations, when they are published.

²¹ <http://www.gov.scot/Resource/0048/00484854.pdf> (page 13)

²² See: http://togetherscotland.org.uk/pdfs/UNCRC_Scotland_NGO_Alternative_Report_2015.pdf (page 26)

²³ <http://www.gov.scot/Resource/0039/00392997.pdf>